

# EXHIBIT B

0001

1 UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY  
2 Civil Action No. 06-CV-3441(WJM)(RJH)

-----X

3 DAVID V. AMES,  
4 Plaintiff  
5 -against-  
6 CORPORATION OF THE PRESIDENT OF  
THE CHURCH OF JESUS CHRIST OF  
7 LATTER-DAY SAINTS, a Utah  
corporation sole, a/k/a the  
8 "MORMON CHURCH," and SCOTT  
HANSON, individually,

9

Defendants.

10 -----X

11

12 VIDEOTAPE DEPOSITION of DAVID V. AMES,  
13 taken by the Defendants at the offices of Latham &  
14 Watkins, LLP, One Newark Center, Newark, New  
15 Jersey 07101, on Tuesday, March 4, 2008, at 10:10  
16 o'clock a.m., before Catherine M. Donahue, a Certified  
17 Court Reporter and Notary Public within and for  
18 the State of New Jersey.

19

20 ROSENBERG & ASSOCIATES, INC.  
21 Certified Court Reporters & Videographers  
22 425 Eagle Rock Avenue - Suite 201  
23 Roseland, New Jersey 07068  
24 (973) 228-9100  
25 www.rosenbergandassociates.com

1 document refreshes your memory. If it

2 does, yes. If it doesn't, it doesn't.

3 MR. KRAUS: That's not actually

4 the question I'm asking.

5 BY MR. KRAUS:

6 Q. Is it correct that you told your  
7 father that you were uncomfortable with Scott  
8 sleeping in the same bed with you a couple  
9 months before Scott actually touched your  
10 genital area?

11 A. Yes.

12 Q. When you told your father that you  
13 were uncomfortable with the way in which Scott  
14 was sleeping in the same bed with you, that  
15 conversation that occurred in September 1998,  
16 did you expect your father to do something about  
17 it?

18 A. I didn't know what to expect.

19 Q. Did you want your father to do  
20 something about it?

21 A. Probably. That's why I told him.

22 Q. Did you want your father to put a  
23 stop to it?

24 A. I guess, yes.

25 Q. Did you want your father to tell

1 Scott not to sleep in the same bed with you and  
2 touch you in a way that made you uncomfortable?

3 A. Yes.

4 Q. Did he do any of those things?

5 A. Not that I was aware of.

6 Q. Did you also tell your mother in or  
7 around September 1998 that you were  
8 uncomfortable with the way in which Scott was  
9 sleeping in the same bed with you?

10 A. I don't remember talking to her.

11 Q. Did you tell any of your sisters?

12 A. I don't remember.

13 Q. Did you tell anyone that you can  
14 recall besides your father?

15 A. I don't know for sure.

16 Q. Do you have any recollection of  
17 telling anybody besides your father?

18 A. No, I don't recall anyone.

19 Q. After you told you father in or  
20 around September 1998 that you were  
21 uncomfortable in the way that Scott was sleeping  
22 in the same bed with you, did Scott continue to  
23 sleep in the same bed with you in your  
24 household?

25 A. Yes.